

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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In the Matter of S.S. and A.S., )  
 )  
 DORAN ANTHONY SATCHEL )  
 )  
 Petitioner, )  
 )  
 vs. )  
 )  
 RENE ALEXIS KIZZI SATCHEL )  
 )  
 Respondent. )

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**AFFIRMATION PURSUANT TO  
LOCAL CIVIL RULE 55.2**

No. 1:25-cv-01309

Richard Min, Esq. hereby declares as follows:

1. I am counsel for Petitioner, Doran Anthony Satchel, in this instant Hague Convention proceeding. I am personally familiar with and have first-hand knowledge of all matters hereinafter stated unless stated upon information and belief.

2. On March 6, 2025, Petitioner filed a petition in this Court under the Hague Convention on the Civil Aspects of Child Abduction, Oct. 25, 1980, art. 13(b), T.I.A.S. No 11670, 1343 U.N.T.S. 89, reprinted in 51 Fed. Reg., 10, 494 (Mar. 26, 1986) (“Hague Convention”), implemented in the United States through the International Child Abduction Remedies Act, 22 U.S.C. § 9001 et seq. (formerly codified at 42 U.S.C. § 11601 et seq.) (“ICARA”), seeking return of the subject Children to Canada.

3. The underlying Petition was filed on March 6, 2025, along with a Proposed Summons in a Civil Action. *See* ECF No. 1. On the same date, this Court issued the Summons directed to Respondent. *See* ECF No. 3.

4. On March 11, 2025, Petitioner filed a Motion to Expedite Proceedings, and for a Temporary Restraining Order. *See* ECF No. 5. That same day, this Court issued an Order to Show Cause directing Respondent, or her counsel, to appear and show cause as to why an order should

not be entered granting Petitioner relief pursuant to the Hague Convention and the International Child Abduction Remedies Act ("ICARA"). *See* ECF No. 6.

5. The Court further ordered Petitioner to serve Respondent with the Order to Show Cause and all related pleadings no later than March 13, 2025. *Id.* Petitioner duly complied with the Court's directive, and Respondent was properly served on March 13, 2025. *See* ECF No. 8.

6. The requirements of Rule 4 of the Federal Rules of Civil Procedure for service have been satisfied. The Summons was served with a copy of the Petition and all other docket entries on Respondent on March 13, 2025, by a person who is at least 18 years old and not a party in this instant action. *Id.*

7. The Show Cause Hearing was scheduled to take place on March 17, 2025, at 3:00 p.m. before the Honorable Judge Cogan. On that date, Respondent failed to appear.

8. Pursuant to Local Civil Rule 55.1, on March 25, 2025, counsel for Petitioner filed a Request for Certificate of Default (ECF No. 10), Declaration in Support (ECF No. 10-1), and Clerks Proposed Certificate of Default (ECF No. 10-2)

9. On March 27, 2025, we filed an Affidavit of Service indicating that the foregoing documents were served on Respondent Rene Alexis Kizzi Satchel on March 26, 2025 (ECF No. 11).

10. On March 28, 2025, this Court ordered the United States Marshal Service to "proceed to Respondent's residence, retrieve the passports of the subject children, S.S. and A.S., and deliver them to the Clerk of the court for safekeeping pending the resolution of this proceeding." (ECF No. 12). The Court further ordered that "the United States Marshals Service shall serve on Respondent, if she is present, copies of the attached Petition for Return and Order to Show Cause. *Id.*

11. On April 1, 2025, a Notice was filed stating that the U.S. Marshals Service had retrieved the passports of the subject Children and delivered them to the Court for safekeeping (ECF No. 14). Furthermore, a Proof of Service, Receipt, and Return was filed on the same day (ECF No. 15).

12. Respondent Rene Alexis Kizzi Satchel has not answered or otherwise moved with respect to the complaint, and the time for Rene Alexis Kizzi Satchel to answer or otherwise move has not been extended.

13. On April 8, 2025, the Clerk of the United States District Court for the Eastern District of New York, Brenna B. Mahoney, entered default of Respondent under Local Civil Rule 55.1 (ECF No. 16). A copy of the Certificate is attached hereto as **Exhibit A**.

14. Petitioner has complied with the Servicemembers Civil Relief Act, 50a U.S.C. § 521 as Respondent is not presently in the military service of the United States as appears from facts in this litigation.

15. Further, the Respondent is not an infant or incompetent.

WHEREFORE, Petitioner Doran Anthony Satchel requests that a default judgment be entered in favor of Petitioner and against Respondent Rene Alexis Kizzi Satchel.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the relief requested is justly due to Petitioner, and that no part thereof has been granted.

Dated: April 8, 2025

Respectfully submitted,

/s/ Richard Min  
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# EXHIBIT A

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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In the Matter of S.S. and A.S., )  
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DORAN ANTHONY SACHEL )  
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Petitioner, )  
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vs. )  
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RENE ALEXIS KIZZI SACHEL )  
 )  
Respondent. )  
\_\_\_\_\_

**CLERK'S CERTIFICATE OF  
DEFAULT**

No. 1:25-cv-01309

I, Brenna B. Mahoney, Clerk of the United States District Court for the Eastern District of New York, do hereby certify that this action was commenced on March 6, 2025, with the filing of a summons and complaint, a copy of the summons and complaint was personally served on respondent on March 13, 2025, and proof of service was therefore filed on March 17, 2025. **ECF No. 8**. I further certify that the docket entries indicate that the respondent has not filed an answer or otherwise moved with respect to the complaint herein. The default of the respondent is hereby noted.

Dated: April 8, 2025  
Brooklyn, New York

BRENNA B. MAHONEY  
Clerk of Court

By: Jalitzia Poveda  
Deputy Clerk